



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

GENERAL NOTICE LETTER
INFORMATION REQUEST
URGENT LEGAL MATTER
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

AUG 20 2011

Ann Klee, Vice President
Corporate Environmental Programs
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06828

Re: General Notice Letter and Request for Information
Yosemite Creek Site in San Francisco, CA

Dear Ms. Klee:

Under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency ("EPA") is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. EPA has documented that such a release has occurred at the Yosemite Creek Site ("the Site") located in San Francisco, CA. EPA has spent, or is considering spending, public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site. Based on information presently available to EPA, EPA has determined that General Electric Company ("GE") may be responsible under CERCLA for cleanup of the Site or costs EPA has incurred in cleaning up the Site.

The Site is located near the intersection of Yosemite Avenue and Hawes Street in San Francisco, San Francisco County, California. The Site was historically the tidal area connecting the surface water flows of Yosemite Creek, which has a drainage encompassing approximately 6,000 acres (Yosemite Basin), to the San Francisco Bay. The Site is a 200 foot wide tidal channel which extends from the historic mouth of the creek approximately 1600 feet (totaling 7.5 acres), where it opens into the South Basin, which adjoins the southern shore of Hunter's Point Shipyard. Due to upland development and installation of storm water and sanitary sewer systems, there is no longer a direct connection between the Site and historic surface water flows from the Creek. The Site, however, continues to receive combined sewer/storm water overflows approximately once per year during large storm events and storm water runoff.

In 2003, the State of California Department of Toxic Substances ("DTSC") completed a remediation at a former drum reconditioning and recycling facility, Bay Area Drum ("BAD"), which operated from 1947 to 1987. The BAD facility is located approximately 800 feet from the

Site at 1212 Thomas Avenue (at the northwest corner of the intersection of Thomas Avenue and Hawes Street).

BAD received plastic and steel drums containing residuals of hazardous substances for reconditioning. During reconditioning, the residual contents of the drums were released to surface soils, subsurface soils, groundwater, and the combined sewer system. DTSC's remediation included: removal and off-site disposal of 6,500 cubic yards of contaminated soils; removal of solid debris; and groundwater remediation. Soils on the site were contaminated with PCBs, metals, including lead, zinc, and mercury, and chlorinated pesticides, including Dieldrin, Chlordane, and DDT. The highest soil concentrations at the BAD facility for the respective contaminants were: PCB's at 2,600,000 ppb; Chlordane at 125,000 ppb; DDT at 231,100 ppb; and Dieldrin at 4,200 ppb. Evidence shows that significant quantities of hazardous substances released at the BAD facility ultimately made their way to the Site through the combined sewer system.

In August 1998, the State of California Bay Protection and Toxic Cleanup Program published a report analyzing sediment quality and biological effects in the San Francisco Bay. In that report Yosemite Creek was found to have the third highest PCB concentrations in sediment in the San Francisco Bay. Since that time, the City of San Francisco Public Utilities Commission and the EPA have conducted assessment activities at the Site which included extensive sediment sampling. In May 2011, EPA finalized an assessment report which indicates elevated levels of the following hazardous substances at the Site: PCBs Aroclor 1254 (130,000 ug/kg), PCB Aroclor 1260 (26,000 ug/kg), PCB congeners (34,368 ug/kg), chromium (796 mg/kg), lead (1,210 mg/kg), mercury (1.70 mg/kg), zinc (1,490 mg/kg), and total petroleum hydrocarbons (9,100 mg/kg).

Explanation of Potential Liability

Under CERCLA, specifically Sections 106(a) and 107(a), potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by EPA in cleaning up the Site, unless the PRP can show divisibility or any of the other statutory defenses. PRPs include current and former owners and operators of a site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected, EPA believes that GE may be liable under Section 107(a) of CERCLA with respect to the Yosemite Site, as an arranger, who by contract or agreement, arranged for the disposal, treatment or transportation of hazardous substances at the BAD facility. Specifically, EPA has reason to believe that your company arranged for the disposal, treatment, or transportation of PCBs and other hazardous substances at the BAD facility. These contaminants then migrated from the BAD facility, through the storm sewer drain, to the Yosemite Creek where they were discharged and remain in the sediments.

Request for Information

Pursuant to the authority of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604, as amended, you are hereby requested to respond to the Information Request set forth in Attachments B and C, attached hereto.

Compliance with the Information Request set forth in Attachments B and C is mandatory. Failure to respond fully and truthfully to the Information Request within thirty (30) days of receipt of this letter, or adequately to justify such failure to respond, can result in enforcement action by EPA pursuant to Section 104(e) of CERCLA, as amended. This statute permits EPA to seek the imposition of penalties of up to \$32,500 for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 3008(d) of RCRA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. 3501, et seq.

Your response to this Information Request should be mailed to:

Craig Whitenack, Civil Investigator
U.S. Environmental Protection Agency Region 9
Southern California Field Office
600 Wilshire Blvd., Suite 1460
Los Angeles, CA 90017

Due to the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above. If you have any legal or technical questions relating to this Information Request, you may consult with the EPA prior to the time specified above. Please direct legal questions to Thanne Cox of the Office of Regional Counsel at (415) 972-3908 or cox.elizabeth@epa.gov. Technical questions should be directed to Craig Whitenack, at the above address, at (213) 244-1820, or at whitenack.craig@epa.gov.

Information to Assist You

EPA would like to encourage communication between you, other PRPs, and EPA at the Site. To assist you in your efforts to communicate, you will find a list of names of PRPs attached to this letter which have been previously noticed of their potential liability, Attachment A. At this time, EPA is asking PRPs at the Site whether they would be willing to negotiate an agreement to perform a response action at the Site. An established group of PRPs from the BAD facility exists. Contact information for the common counsel for that group of PRPs is as follows:

Nicholas W. van Aelstyn
Beveridge & Diamond, PC
456 Montgomery Street ~ Suite 1800
San Francisco, CA 94104
(415) 262-4008
NvanAelstyn@bdlaw.com

Please give these matters your immediate attention. If you have any questions regarding this letter, please contact Thanne Cox at (415) 972-3908 or cox.elizabeth@epa.gov. Thank you for your prompt attention to this matter.

Sincerely,



Daniel Meer, Assistant Director
Superfund Division

Enclosures

cc: Craig Whitenack, EPA
Thanne Cox, EPA
Nicholas W. van Aelstyn, BAD PRP Group
Elaine M O'Neil, City of San Francisco
Katherine Tobias, California Department of Parks and Recreation

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

Liabic Company Name	Generator Company	Contact
Aerojet-General Corporation	Aerojet-Strategic Propulsion Co.	William Hvidsten, Senior Counsel Aerojet-General Corporation PO Box 13222 Sacramento, CA 95813-6000 916/351-8524
Akzo Nobel	International Paint Co.	Deborah J. Rubenstein, Senior Regulatory Counsel HSERA Akzo Nobel Inc. 120 White Plains Road Suite 300 Tarrytown, NY 10591-5522 914-333-7488
Akzo Nobel	U.S. Cellulose	Deborah J. Rubenstein, Senior Regulatory Counsel HSERA Akzo Nobel Inc. 120 White Plains Road Suite 300 Tarrytown, NY 10591-5522 914-333-7488
Alcoa	Reynolds Metals Company	Malcolm C. Weiss Hunton & Williams LLP 550 South Hope Street, Suite 2000 Los Angeles, CA 90071-2627 213/532-2130
Ashland, Inc.	Ashland Chemical Company (a division of Ashland, Inc.)	Richmond L. Williams, Chief Counsel - Environmental Litigation Ashland, Inc. 1313 N. Market Street Wilmington, DE 19894 302/594-7020
California Department of Parks and Recreation		Katherine Tobias California Department of Parks and Recreation 1416 9th Street, 14th Floor Sacramento, California 95814 (916) 651-8772 EMAIL: ktobias@parks.ca.gov
Chevron Corporation	Chevron U.S.A., Inc.	Timothy Knutson, Senior Counsel Chevron USA, Inc. 6111 Bollinger Canyon Road San Ramon, CA 94583 925/543-1720
Chevron Corporation	Amsco - Union Chemicals	Timothy Knutson, Senior Counsel Chevron USA, Inc. 6111 Bollinger Canyon Road San Ramon, CA 94583 925/543-1720
Chevron Corporation	Union Oil Company of California dba Unocal Corporation	Timothy Knutson, Senior Counsel Chevron USA, Inc. 6111 Bollinger Canyon Road San Ramon, CA 94583 925/543-1720

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

Chevron U.S.A., Inc. (Puregro Company)	Puregro Company	Timothy Knutson, Senior Counsel Chevron USA, Inc. 6111 Bollinger Canyon Road San Ramon, CA 94583 925/543-1720
City and County of San Francisco		Elaine M. O'Neill Deputy City Attorney City and County of San Francisco 1390 Market Street, 7th Floor San Francisco, CA 94102 415/554-3881
Delta Air Lines, Inc.	Delta Air Lines, Inc.	Christine H. Boucher, General Attorney Delta Air Lines, Inc. PO Box 20574 Atlanta, GA 30320 404/715-9921
Dorsett & Jackson, Inc.	Carmona Chemical (Dorsett & Jackson)	Rubin M. Turner Turner, Aubert & Friedman, LLP 8383 Wilshire Boulevard, Suite 510 Beverly Hills, CA 90211 323/653-3900
E.I. DuPont de Nemours & Co., Inc.	Dupont	Andrew T. Mortl Glynn & Finley, LLP One Walnut Creek Center, Suite 500 100 Pringle Avenue Walnut Creek, CA 94596 925/210-2805
Eureka Chemical Company	Eureka Chemical Company	Steven H. Bovarnick Leland, Parachini, Steinberg, Matzger & Melnick, LLP 199 Fremont Street, 21st Floor San Francisco, CA 94015 415/243-2224
ExxonMobil Corporation	Exxon Company, USA	Robert W. Jackmore, Area Manager ExxonMobil Environmental Services Company 3225 Gallows Road Fairfax, VA 22037 703/846-6032
Ford Motor Company	Ford Motor Company	David J. Witten Ford Motor Company Office of the General Counsel Environmental & Safety Regulatory Matters One American Road, Room 407-A2 Dearborn, MI 48126 313/845-8476
General Motors Corporation	General Motors Corporation	Thomas D. Goslin Weil, Gotshal & Manges LLP 1300 Eye Street, NW Suite 900 Washington, DC 20005 202/682-7508
Haz/Control, Inc.	Haz/Control, Inc. (for South Bay Chemical, Inc.)	

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

Hewlett-Packard Company	Hewlett Packard	Sharon Oras Morgan Fox Rothschild LLP 919 North Market Street, Suite 1300 Wilmington, DE 19899-2323 302/622-4246
Honeywell International, Inc.	Baron Blakeslee, Inc. (Allied Signal)	Kerri L. Stelcen Arnold & Porter LLP 555 Twelfth Street, NW Washington, DC 20004-1208 202/942-5529
Akzo Nobel Paints LLC	The Glidden Co.	Deborah J. Rubenstein, Senior Regulatory Counsel HSERA Akzo Nobel Inc. 120 White Plains Road Suite 300 Tarrytown, NY 10591-5522 914-333-7488
Ingersoll-Rand Company	Schlage Lock	Aaron Kleinbaum, Vice President Environment, Health & Safety Ingersoll-Rand Company One Centennial Avenue Piscataway, NJ 08854 732/652-7000
Intel Corporation	Intel Corporation	Mark D. Mueller, Senior EHS Corporate Attorney Intel Corporation 4500 South Dobson Road OC2-157 Chandler, AZ 85248 480/715-2448
International Paper Company	International Paper Company (for Stecher-Traung-Schmidt)	Steven J. Ginski, Chief Counsel Health, Safety & Remediation International Paper International Place II 6400 Poplar Avenue Memphis, TN 38197 901/419-3808
Inter-State Oil Company	Interstate Oil	David A. Melton Porter Scott 350 University Avenue, Suite 200 Sacramento, CA 95825 916/929-1481 916/929-1481
ITW PMI Investments, Inc.	Stero Company	Ken Brown, Manager Environmental and Chemical Compliance Illinois Tool Works, Inc. 3600 West Lake Avenue Glenview, IL 60026-1215 847/724-7500
Kaiser Aluminum & Chemical Corp.	Kaiser Aluminum	Jack A. Hockema, President Kaiser Aluminum & Chemical Company 27422 Portola Parkway, Suite 350 Foothill Ranch, CA 92610

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

Kelly Moore Paint Company, Inc.	Kelly Moore Paint Co. Inc	Robert Stetson Kelly-Moore Paint Company Director of Risk Management 987 Commercial Street San Carlos, CA 94070 650/592-8337
Lockheed Martin Corporation	Lockheed Missiles	Corinne L. Bogert, Sr. Manager Environment, Safety & Health Lockheed Martin Space Systems 1111 Lockheed Martin Way Sunnyvale, CA 94089 408/742-4321
Maxus Energy Corporation	Diamond Shamrock	Derrick Vallance, Assistant General Counsel Maxus Energy Corporation 1330 Lake Robbins Drive, Suite 300 The Woodlands, TX 77380 281/681-7255
McKesson HBOC, Incorporated	McKesson Chemical	Marilyn Jenkins Edgcomb Law Group 115 Sansome Street, Suite 700 San Francisco, CA 94105 415/692-8144
Monsanto Company	Monsanto Company	Pamela A. Howlett Bryan Cave LLP One Metropolitan Square 211 North Broadway, Suite 3600 St. Louis, MO 63102 314/259-2195
NL Industries, Inc.	Spencer Kellogg	Courtney J. Riley Executive Director Environmental Management NL Industries, Inc. Three Lincoln Centre 5430 LBJ Freeway, Suite 1700 Dallas, TX 75240 972/448-1466
Northrop Grumman Corporation	Litton Industries	Elizabeth C. Brown Northrop Grummen Corporation 1840 Century Park East Los Angeles, CA 90067 310/201-3278
Olympian	Olympian Oil Co.	Daphne C. Lin Trump, Alloto, Trump & Prescott, LLP 2201 Walnut Avenue, Suite 200 Fremont, CA 94538 510/790-4856
Owens-Illinois, Inc.	Owen Illinois (Brockway Glass)	Susan L. Smith, Counsel Owens-Illinois, Inc. One Micheal Owens Way - Plaza 3 Perrysburg, OH 43551 567/336-8699

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

Pacific Gas & Electric Company	Pacific Gas & Electric Company	<p> Ruben Castellon Castellon & Funderburk, LLP 3200 Danville Boulevard, Suite 100 Alamo, CA 94507 925/837-1199 </p>
Pacific Scientific Energetic Materials Company	Teledyne	<p> Charles F. Martin, Manager Environment Health & Safety Pacific Scientific Energetic Materials Company 3601 Union Road Hollister, CA 95023 831/637-3731 </p>
Peninsula Oil Company	Peninsula Oil Company	<p> Thomas J. Wilson, Principal Peninsula Oil Company 13407 Reefer Ct. Grass Valley, CA 95945 530/268-1043 </p>
Pennzoil-Quaker State Company	Pennzoil Company	<p> Roberta S. Lewis, Senior Legal Counsel Shell Oil Company One Shell Plaza 910 Louisiana - OSP 4864 Houston, TX 77002 713/241-7188 </p>
Pennzoil-Quaker State Company	Quaker State Oil	<p> Roberta S. Lewis, Senior Legal Counsel Shell Oil Company One Shell Plaza 910 Louisiana - OSP 4864 Houston, TX 77002 713/241-7188 </p>
R.J. McGlennon Company, Inc.	R.J. McGlennon Company, Inc. (MacLac)	<p> Michael McGlennon, President R.J. McGlennon Co., Inc. 198 Utah Street San Francisco, CA 94103 415/552-0311 </p>
Redding Petroleum, Inc.	Redding Petroleum aka Industrial Oil	<p> Daniel P. Costa The Costa Law Firm 2489 Sunrise Blvd., Suite A Gold River, CA 95670 916/400-2734 </p>
Redwood Oil Company	Redwood Oil Company	<p> Peter Van Alyea, President 50 Professional Center Drive, Suite 100 Rohnert Park, CA 94928 707/584-7000 </p>
Reichhold, Inc.	Reichhold Chemicals, Inc.	<p> Keith F. Millhouse Millhouse Law Group 2801 Townsgate Road, Suite 215 Westlake Village, CA 91361 805/230-2280 </p>

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

Roche Palo Alto LLC	Syntex Labs	Kevin A. Marks, Vice President and General Counsel Roche Palo Alto LLC 3431 Hillview Avenue Palo Alto, CA 94304 650/855-5100
Rochester Midland Corporation	Bytech Chemical	Ronald G. Hull, Senior Counsel Underberg & Kessler 300 Bausch & Lomb Place Rochester, NY 14604 585/258-2853
Rohm & Haas Company	Rohm & Haas Company	Shannon Slowey, Esq. Rohm & Haas Company 100 Independence Mall West Philadelphia, PA 19106 215/592-3000
Romic Environmental Technologies Corporation	Romic Chemical	Wayne Kiso, President Romic Environmental Technologies Corp 820 Gessner Road, Suite 800 Houston, TX 77024 713/400-1568
San Francisco Bay Area Rapid Transit District	Bay Area Rapid Transit District	Thomas C. Lee San Francisco Bay Area Rapid Transit District 300 Lakeside Drive Oakland, CA 94604 510/464-6000
Sequa Corporation	General Printing Ink (Sequa Corp.)	Holly J. Tate Latham & Watkins LLP 505 Montgomery Street, Suite 2000 San Francisco, CA 415/391-0600
Shell Oil Company	Shell Oil	William E. Platt III Senior Manager, Environmental Claims Shell Oil Company One Shell Plaza 910 Louisiana - OSP 4864 Houston, TX 77002 713/241-5126
Simpson Coatings Group, Inc.	Simpson Coatings (Organic Coatings)	Tim Simpson, President 111 South Maple Avenue South San Francisco, CA 94080 650/873-5990
Stanford University	Stanford University	Lawrence Gibbs, Associate Vice Provost Environmental Health & Safety Stanford University 480 Oak Road Stanford, CA 94305 650/725-7529

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

Syngenta Crop Protection, Inc.	Zoecon Corp.	Christian Volz McKenna Long & Aldridge LLP 101 California Street, 41st Floor San Francisco, CA 94111 415/267-4108
Tap Plastics, Inc.	Tap Plastics, Inc. (Chemco)	Lance Anderson Miller Starr Regalia. 435 Tasso Street, Suite 315 Palo Alto, CA 94301 650/463-7800
Textron, Inc.	Spencer Kellogg	Jamieson Schiff Director, Site Remediation Textron, Inc. 40 Westminster Street Providence, RI 02903 401/457-2422
The Dow Chemical Company	Dow Chemical	Shannon Slowey, Esq. The Dow Corporation 100 Independence Mall West Philadelphia, PA 19106 215/592-3000
The O'Brien Corporation	O'Brien Corp. (Fuller O'Brien Paints)	Thomas Karaba Crowley Barrett & Karaba Ltd. 20 South Clark Street, Suite 2310 Chicago, IL 60603 312/726-2468
TriMas Corporation	Norris Industries (Riverbank Ammo plant)	Albert H. Bostain TriMas Corporation 39400 Woodward Avenue, Suite 130 Bloomfield Hills, MI 48304 260/925-3700
Tyco Electronics	Raychem Corporation	Carl B. Schultz, Sr. Counsel Tyco Electronics Corporation 2100 Paxton St. Harrisburg, PA 17111
Union City Chemicals Incorporated	Union City Chemicals	Oliver C. Todd, Principal Union City Chemicals Incorporated 777 Silver Tip Ct. Sunnyvale, CA 94086
United Air Lines, Inc.	United Air Lines, Inc.	John W. Watson United Air Lines, Inc. 77 W Wacker Dr. Ste. 1000 Chicago, IL 60601
United States Defense Reutilization Marketing Service	Defense Property Disposal	Mark A. Rigau, Senior Trial Counsel U.S. Dept. of Justice Environment and Natural Resources Div Environmental Defense Section 301 Howard Street, Suite 1050 San Francisco, CA 94105 415/744-6487

Attachment A
Yosemite Creek Superfund Removal Site - Parties Noticed by EPA

United Technologies Corporation	United Technologies Corporation	William F Leikin Assistant General Counsel United Technologies Corporation One Financial Plaza, Mailstop 524 Hartford, CT 06101 860/728-7000
Univar USA Inc.	Van Waters & Rogers, Inc./Vopak Distribution Americas Corporation Chem Central	Leslie R. Schenck Garvey Schubert Barer Second & Seneca Bldg, 18th Floor Seattle, WA 98101 206/464-3939
University of California	Lawrence Berkeley Lab	Nancy Ware, Senior Counsel Lawrence Berkeley National Laboratory One Cyclotron Road Berkeley, CA 94702 510/486-7096
University of California	U.C. Regents Univ. of California, San Francisco	Anthony O. Garvin, Senior Counsel Office of the General Counsel The Regents of the University of California 1111 Franklin Street, 8th Floor Oakland, CA 94607 510/987-9737
W.R. Grace & Company	W.R. Grace/Dewey Almy	Robert Emmett, Sr. Environmental Counsel W.R. Grace & Company 7500 Grace Drive Columbia, MD 21044 410/531-4751
W.R. Meadows, Inc.	W.R. Meadows, Inc.	Kenneth G. Anspach Anspach & Associates Eight South Michigan Avenue, Suite 3400 Chicago, IL 60603 312/407-7888
WDC Liquidating Inc.	Waymire Drum Co.	Edward L. Waymire, Principal WDC Liquidating, Inc. 579 Lake Huron Lane Boulder City, NV 89005+E68

ATTACHMENT B

INFORMATION REQUEST INSTRUCTIONS

1. Provide a separate narrative response to each and every question and Subpart of a question set forth in this Information Request. Information must be provided to EPA whether or not such information is contained in available documents.
2. Precede each answer with the number of the question to which it corresponds. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
3. Where any person covered by this request has information that has not been memorialized in any document, but is nonetheless responsive to a question, you must nonetheless provide such information in response to this request.
4. For each and every question contained in this letter, if information responsive to this Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained. For each individual, provide the following: name, last known or current address, telephone number, and affiliation with your company or the Site.
5. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after submission of its response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
6. The scope of this request includes all information and documents independently developed or obtained by research on the part of your company, its attorneys, consultants or any of their agents, consultants or employees.
7. To the extent that there are any documents that are responsive to this Information Request that you are withholding for any reason, you should identify the document and state your basis for withholding the document. To the extent that you do not respond to any request, describe your basis for withholding the information.

INFORMATION REQUEST DEFINITIONS

The following definitions shall apply to the words appearing in this Information Request.

1. The term "BAD Site" means the property known as the former Bay Area Drum facility, located at 1212 Thomas Avenue in San Francisco, California where Bay Area Drum Company, Inc. and successive operators conducted container cleaning and reconditioning operations.
2. The term "document" or "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
3. The term "Facility" or "Facilities" means any facility owned or operated by you from 1940 to 1988 to include any facility owned or operated by you during this time period but no longer owned or operated by you and any facility operating during this time period that you currently own or operate.
4. The term "hazardous material" means all hazardous substances, pollutants or contaminants, as defined above.
5. The term "hazardous substance" has the same definition as Section 101(14) of CERCLA and includes any mixtures of hazardous substances with other substances, including petroleum products.
6. The term "identify" means, with respect to an individual person, the person's name, business address, business telephone number, home address, and person's title, position, or business.
7. The term "identify" means, with respect to a corporation, partnership, business trust, other association or business entity (including sole proprietorship) the full name, address, legal form of organization (e.g. corporation, partnership, etc.), if any, and a brief description of the business.
8. The term "identify" means, with respect to a document, its normal business description, its date, its number, any (invoice or purchase order number), the identity of the author, addressee, addressee or recipient, and substance or the subject matter.
9. The term "Materials" means PCBs, SOIs, hazardous substances, pollutants and contaminants, hazardous wastes, and solid wastes, as defined in this Enclosure.
10. The term "PCBs" means polychlorinated biphenyls.
11. The term "person" has the same definition as Section 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State or any interstate body.

12. The term "pollutant" or "contaminant" has the same definition as Section 101(33) of CERCLA, and includes any mixtures of pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included.

13. The term "release" has the same definition as Section 101(22) of CERCLA, 42 U.S.C. 9601(22), and includes any spilling, leaking, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances or pollutant or contaminant.

14. The terms "Respondent" or "you" or "the company" or "your" or "your company" refer not only to the addressee of this letter as it is currently named and constituted, but also to all predecessors and successors in interest of the addressee, and all subsidiaries, divisions, affiliates, and branches of the addressee and its predecessors and successors.

15. The term "store" or "storage" means to have present at a Facility at any time and for any purpose.

16. The term "Substance of Interest" or "SOP" means PCBs, hydraulic oils, and transformer oils.

17. The terms "and" and "or" shall be construed either disjunctively or conjunctively to bring within the scope of this Information Request any information which might be construed to be outside its scope.

18. Words in the masculine shall be construed in the feminine, and vice versa and words in the singular shall be construed in the plural, and vice versa, to bring within the scope of this Information Request any information that might be construed to outside the scope.

19. All terms not defined have their ordinary meaning unless such terms are defined in CERCLA, in which case the statutory definitions shall apply.

20. The terms "you" or "your" shall reference to you and each and every authorized representative responding to this Information Request.

ATTACHMENT C

INFORMATION REQUEST QUESTIONS

1. Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.
2. Provide the name (or other identifier) and address of any facilities where Respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:
 - a. ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale;
 - b. are/were located in California (excluding locations where ONLY clerical/office work was performed); and
 - c. are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).
3. Provide a brief description of the nature of Respondent's operations at each Facility identified in your response to Question 2 (the "Facilities") including:
 - a. the date such operations commenced and concluded; and
 - b. the types of work performed at each location over time, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.
4. For each Facility, describe the types of records regarding the storage, production, purchasing, and use of Substances of Interest ("SOI") during the Relevant Time Period that still exist and the periods of time covered by each type of record.
5. For each Facility, provide a complete description of where drums or other containers were sent for disposal or reconditioning and the circumstances under which the drums or other containers were removed from the Facility for either purpose. Describe any changes in Respondent's practices regarding drum disposal or reconditioning over time.
6. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store PCBs (including any substances or wastes containing the PCBs) at any of the Facilities? State the factual basis for your response.
7. If the answer to Question 6 is yes, specifically identify each PCB substance, or substance or waste containing PCBs, produced, purchased, used, or stored at each Facility.

8. If the answer to Question 6 is yes, identify the time period during which each PCB substance, or substance or waste containing PCBs, was produced, purchased, used, or stored at each Facility.
9. If the answer to Question 6 is yes, identify the average annual quantity of each PCB substance, or substance or waste containing PCBs, produced, purchased, used, or stored at each Facility.
10. If the answer to Question 6 is yes, identify the volume of each PCB substance, or substance or waste containing PCBs, disposed by the Facility annually and describe the method and location of disposal.
11. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store hydraulic oil or transformer oil at any of the Facilities? State the factual basis for your response to this question.
12. If the answer to Question 11 is yes, identify each specific type of hydraulic oil and transformer oil produced, purchased, used, or stored at each Facility.
13. If the answer to Question 11 is yes, identify the time period during which each type of hydraulic oil and transformer oil was produced, purchased, used, or stored.
14. If the answer to Question 11 is yes, identify the average annual quantity of each type hydraulic oil and transformer oil purchased, produced, used, or stored at each Facility.
15. If the answer to Question 11 is yes, identify the volume of each hydraulic oil and transformer oil disposed by the Facility annually and describe the method and location of disposal.
16. Provide the following information for each SOI (SOIs include any substance or waste containing the SOI) identified in your responses to Questions 6 and 11:
 - a. Describe briefly the purpose for which each SOI was used at the Facility. If there was more than one use, describe each use and the time period for each use;
 - b. Identify the supplier(s) of the SOIs and the time period during which they supplied the SOIs, and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the procurement of the SOI;
 - c. State whether the SOIs were delivered to the Facility in bulk or in closed containers, and describe any changes in the method of delivery over time; and
 - d. Describe how, where, when, and by whom the containers used to store the SOIs (or in which the SOIs were purchased) were cleaned, removed from the Facility, and/or disposed of, and describe any changes in cleaning, removal, or disposal practices over time.
17. For each container that Respondent used to store a SOI or in which SOIs were purchased ("Substance-Holding Containers" or "SHCs") that was removed from the Facility, describe Respondent's contracts, agreements, or other arrangements under which SHCs were removed from the Facility, and identify all parties to each contract, agreement, or other arrangement described.

18. Identify all individuals who currently have, and those who have had, responsibility for procurement of Materials at the Facilities. Also provide each individual's job title, duties, dates performing those duties, current position or the date of the individual's resignation, and the nature of the information possessed by each individual concerning Respondent's procurement of Materials.
19. Describe how each type of waste containing any SOIs was collected and stored at the Facilities prior to disposal/recycling/sale/transport, including:
 - a. the type of container in which each type of waste was placed/stored; and
 - b. how frequently each type of waste was removed from the Facility.Describe any changes in Respondent's practices over time regarding the collection and storage of waste containing SOIs.
20. For each type of waste generated at the Facilities that contained any of the SOIs, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling and identify all parties to each contract, agreement, or other arrangement described. State the ownership of waste containers as specified under each contract, agreement, or other arrangement described and the ultimate destination or use for such containers. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.
21. Identify all individuals who currently have, and those who have had, responsibility for Respondent's environmental matters in California (including responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes and SHCs). Provide the job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.
22. Did Respondent ever purchase drums or other containers from a drum recycler or drum reconditioner in California? If yes, identify the entities or individuals from which Respondent acquired such drums or containers.
23. Prior to 1988, did Respondent always keep its waste streams that contained SOIs separate from its other waste streams?
24. Identify all removal and remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et seq., or comparable state law; all corrective actions conducted pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.; and all cleanups conducted pursuant to the Toxic Substances Control Act, 15 U.S.C. § 2601 et seq. where (a) PCBs were addressed by the cleanup and (b) at which Respondent paid a portion of cleanup costs or performed work. Provide copies of all correspondence between Respondent and any federal or state government agency that (a) identifies PCBs and (b) is related to one of the above-mentioned sites.

25. Provide all records of communication between Respondent and Bay Area Drum Company, Inc.; Meyers Drum Company; A.W. Sorich Bucket and Drum Company; Waymire Drum Company, Inc.; Waymire Drum and Barrel Company, Inc.; Bedini Barrels Inc.; Bedini Steel Drum Corp.; Bedini Drum; or any other person or entity that owned or operated the facility located at 1212 Thomas Avenue, in the City and County of San Francisco, California.
26. Identify the time periods regarding which Respondent does not have any records regarding the SOIs that were produced, purchased, used, or stored at the Facilities.
27. Provide copies of all documents containing information responsive to the previous twenty-six questions and identify the questions to which each document is responsive.